STATE OF CALIFORNIA
Arnold Schwarzenegger, Governor

DEPARTMENT OF INDUSTRIAL RELATIONS
Division of Occupational Safety and Health
Northern CA Process Safety Management
1450 Enea Circle, Suite 550
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05/13/10

TO: **Chevron Products Company - Richmond Refinery**

FROM: Carla Fritz
Cal OSHA Compliance Engineer

SUBJ: **Program Quality Verification (PQV)**

The tragic accident at the Tesoro Refinery in Washington on 04/02/10 has focused attention on Naphtha Hydrotreater process units in general, and NHT feed-effluent heat exchangers in particular. Both the Northern and Southern California Process Safety Management district offices will be conducting PQVs in refinery NHTs in their respective regions.

Pursuant to my investigation in your facility, please provide copies of the documents identified on the attached Document Request for my review and case file by **05/25/10**. Please be advised that I may request additional documents.

Thank you in advance for your cooperation.

Carla Fritz
Cal Osha No. CA PSM
(925) 602-5779
(925) 602-2668 (fax)

Ref: 314323429

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Document Request

Chevron Products Co – Richmond Refinery

Pursuant to my inspection as a Cal/OSHA Safety Engineer, please provide copies of the following documents for my casefile and review.

Please postmark response by: 05/25/10

1) Process overview/description for Naphtha Hydrotreater
2) P&ID for NHT feed-effluent heat exchangers (hereafter 'hex')
3) Most recent PHA for the NHT, including recommendations & their disposition
4) Most recent PHA for the Desalter(s), including recommendations & their disposition
5) Written operating procedures specific to NHT feed-effluent hex
6) Written inspection procedures specific to NHT feed-effluent hex
7) Written maintenance procedures specific to NHT feed-effluent hex
8) Inspection, testing & monitoring procedures specific to NHT corrosion phenomena; including operational aspects affecting corrosion and fouling, chloride control, chemical injection (caustic, ammonia, corrosion inhibitors), wash water injection, ammonium chloride & ammonium bisulfide corrosion/fouling control
9) Materials selection criteria for NHT feed-effluent hex + associated piping
10) NHT feed-effluent hex inspection & repair data; including inservice & turnaround inspection recommendations & their disposition, operational upsets, corrosion & fouling control methodology specific to the hex (last 5 yrs)
11) NHT feed-effluent hex incident upsets, near misses + investigative reports (last 5 yrs)
12) MOC specific to the NHT feed-effluent hex (last 5 yrs)
13) NHT feed-effluent hex relief design basis
14) P&ID for the desalters
15) Written operating procedures specific to the desalter(s)
16) Design specifications for the desalters
17) Operating parameters for the desalters
18) Chloride monitoring data for the desalters (last 3 yrs)
19) Procedures for selection, installation, material and design controls of equipment gaskets for hex.
20) Testing & acceptance protocols for crude inventory

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Document Request- Amended

Chevron Products Co – Richmond Refinery ~~05/17/10~~ 06/03/10

Pursuant to my inspection as a Cal/OSHA Safety Engineer, please provide copies of the following documents for my casefile and review.

Please postmark response by: ~~05/25/10~~ 06/08/10

1) Process overview/description for Naphtha Hydrotreater
2) P&ID for NHT feed-effluent heat exchangers (hereafter 'hex')
3) Most recent PHA for the NHT, including recommendations & their disposition **07/03/10 (or as soon as available)**
4) Most recent PHA for the Desalter(s), including recommendations & their disposition
5) Written operating procedures specific to NHT feed-effluent hex
6) Written inspection procedures specific to NHT feed-effluent hex
7) Written maintenance procedures specific to NHT feed-effluent hex
8) Inspection, testing & monitoring procedures specific to NHT corrosion phenomena; including operational aspects affecting corrosion and fouling, chloride control, chemical injection (caustic, ammonia, corrosion inhibitors), wash water injection, ammonium chloride & ammonium bisulfide corrosion/fouling control
9) Materials selection criteria for NHT feed-effluent hex + associated piping
10) Inspection, testing & monitoring procedures *specific* to NHT F/E hex corrosion phenomena; including hydrogen attack, fouling & chloride control, chemical injection, wash water injection, ammonium chloride & ammonium bisulfide corrosion/fouling control
11) NHT feed-effluent hex incident upsets, near misses + investigative reports (last 5 yrs)
12) MOC specific to the NHT feed-effluent hex (last 5 yrs)
13) NHT feed-effluent hex relief design basis
14) P&ID for the desalters
~~15) Written operating procedures specific to the desalter(s)~~
~~16) Design specifications for the desalters~~
~~17) Operating parameters for the desalters~~
18) Chloride monitoring data for the desalters (last 3 yrs)
19) Procedures for selection, installation, material and design controls of equipment gaskets (feed-effluent hex)
20) Testing & acceptance protocols for crude inventory

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